

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

WILLIAM JAY COHEN, individually and in his
capacity as Trustee of the William Jay Cohen
Revocable Trust dtd 11/14/89; and WILLIAM JAY
COHEN REVOCABLE TRUST DATED 11/14/89,

Defendants.

Adv. Pro. No. 10-04787 (SMB)

NOTICE OF EXTENDED RESPONSE DUE DATE

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]. Pursuant to the Notice of Applicability filed by Plaintiff, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Services LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et. seq.* (“SIPA”), and the substantively

consolidated estate of Bernard L. Madoff individually (“Madoff”), in this Adversary Proceeding on December 6, 2010 [Dkt. No. 2], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, § 2(E), the Trustee is required to file a “Notice of Extended Response Due Date” upon the termination of mediation setting forth the new response due date.

The mediation of the Adversary Proceeding took place at the offices of Baker & Hostetler LLP in New York, New York on October 29, 2014. The mediation was unsuccessful and the deadline to conclude mediation passed on November 14, 2014. In accordance with the Order, the Extended Response Due Date for Defendants to respond to the Complaint is Friday, January 16, 2015.

Dated: December 4, 2014
New York, New York

Respectfully submitted,

Of Counsel:

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*